

DATE: 8 May 1986

TO: G.H. Setlock

FROM: N.M. Daugherty

SUBJECT: Comments on Draft "Specific Responses to Issues Raised ." by A.J. Hazle.

Page 2. 2nd paragraph -

Re: "...The primary criteria contained in the proposed EPA transuranic guidance of 10 millirad to the lung in the 70th year...";

This should read "...1 millirad to the lung..." (The bone surfaces value is correct at 30 millirad.)

Re: "...The Clean Air Act amendment promulgated regulations addressing radionuclides do not address plutonium."

It is unlikely that the promulgated Clean Air Act amendment would apply to this situation, but not for the reason given here. It does address airborne plutonium- (as well as all other airborne radioactive materials-) emissions from DOE facilities. However, since the land in question is not owned by DOE, nor under its control, the Clean Air Act amendment is likely not applicable. The proposed EPA transuranic guidance was written specifically to address the issue of remedial actions for land contaminated in the past with transuranics, and it is this guidance--as well as the State standard--which is most directly applicable.

Re: ...The regulations [Clean Air Act] that were proposed had the same criteria that was included in the EPA proposed transuranic guidance. As the proposed EPA guidance would not be exceeded, the draft proposed but not adopted CAA regulations on radionuclides would not be exceeded."

The dose limits for the Clean Air Act amendment are not the same as those for the proposed EPA transuranic guidance. If "criteria" refers to dose limits, the statement above is incorrect.